
EXHIBIT 1

From: [Cohen, Justin S \(DFW - X61211\)](#)
To: [Michael Shore](#)
Cc: [Team-Purdue-ST](#); [Max Ciccarelli](#); [Sostek, Bruce S \(DFW - X61234\)](#); [STPurdueHKService](#)
Subject: RE: Default
Date: Tuesday, May 24, 2022 2:56:14 PM

CAUTION: External Email!

Michael - thank you for confirming that we are on the same page regarding STNV. Our firm is no longer representing ST International N.V. Our representation was limited to the special appearance challenging service.

Regards,

~Justin

Justin S. Cohen | Holland & Knight

Direct 214.969.1211 | Cell 214.605.1993

[Add to address book](#) | [View professional biography](#)

From: Michael Shore <mshore@shorechan.com>
Sent: Tuesday, May 24, 2022 2:43 PM
To: Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>
Cc: Team-Purdue-ST <Team-Purdue-ST@shorechan.com>; Max Ciccarelli <Max@CiccarelliLawFirm.com>; Sostek, Bruce S (DFW - X61234) <Bruce.Sostek@hklaw.com>; STPurdueHKService <STPurdueHKService@hklaw.com>
Subject: RE: Default

[External email]

ST International, NV is in default. No order stays any deadlines as to them. File an answer or Purdue will seek a default.

Sent via the Samsung Galaxy S22 5G, an AT&T 5G smartphone

----- Original message -----

From: "Cohen, Justin S (DFW - X61211)" <Justin.Cohen@hklaw.com>
Date: 5/24/22 2:40 PM (GMT-06:00)
To: Michael Shore <mshore@shorechan.com>
Cc: Team-Purdue-ST <Team-Purdue-ST@shorechan.com>, Max Ciccarelli <Max@CiccarelliLawFirm.com>, "Sostek, Bruce S (DFW - X61234)" <Bruce.Sostek@hklaw.com>, STPurdueHKService <STPurdueHKService@hklaw.com>
Subject: RE: Default

CAUTION: External Email!

Michael - can you please explain how you arrived at this due date for STNV's answer? The Court's

April 27 order stated that "[a]ll deadlines in this Action regarding Purdue's claims against Defendant STNV are STAYED pending resolution of any subsequent Rule 12(b)(2) motion STNV may file consistent with the order above." [ECF 84 at 14]. By our reading, the Court expects (and we intend) to refile STNV's motion to dismiss for lack of jurisdiction at the conclusion of jurisdictional discovery. Filing an answer would arguably serve as a waiver of STNV's forthcoming Rule 12 motion--a motion that that Court expects STNV to file soon after jurisdictional discovery closes on June 27.

If you believe that STNV is required to file an answer in the interim, then I believe we have a fundamental disagreement over the scope of the Court's order.

Please advise so we can discuss, and if necessary, seek additional guidance from the Court on this issue.

Regards,

~Justin

Justin S. Cohen | Holland & Knight

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From: Michael Shore <mshore@shorechan.com>

Sent: Tuesday, May 24, 2022 2:29 PM

To: Max Ciccarelli <Max@CiccarelliLawFirm.com>; Sostek, Bruce S (DFW - X61234) <Bruce.Sostek@hklaw.com>; Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>

Cc: Team-Purdue-ST <Team-Purdue-ST@shorechan.com>

Subject: Default

[External email]

ST Lawyers,

Unless we see an answer from ST NV by Thursday at 5pm, Purdue will seek a default judgment. The ST NV answer or response is now a month overdue.

MWS

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